

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE CT GROUP HOLDINGS LIMITED
FOR AN ORDER TO TAKE DISCOVERY
FOR USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

Case No. 23-MC-00403

DECLARATION OF EDWARD GREENO

I, Edward Greeno, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury under the laws of the United States, as follows:

1. I submit this declaration in support of the expedition of CT Group Holdings Limited (“CT Group” or “Petitioner”)’s *Ex Parte* Application and Petition For An Order To Conduct Discovery From e` Clearing House Payments Company LLC (“CHIPS”) and e` New York Federal Bank of New York (“Federal Reserve Bank” and, together with CHIPS, the “Respondents”) For Use In A Foreign Proceeding Pursuant To 28 U.S.C. § 1782 (“1782 Application”). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the 1782 Application and accompanying Memorandum of Law.

I. BASIS FOR EXPEDITION

2. Petitioner’s 1782 Application seeks discovery for use in an ongoing proceeding before the [REDACTED] The [REDACTED] are related to proceedings before the [REDACTED] (respectively, the [REDACTED] to which Petitioner is not party.

3. I understand that the determination of Petitioner’s *ex parte* 1782 Application may have been delayed by reason of Petitioner’s Motion for Leave to File Under Seal Portions of Petitioner’s Application filed on 7 November 2023. However, both the [REDACTED] and

the [REDACTED] are subject to stringent timelines that could still be met if Petitioner's 1782 Application were expedited.

4. There is now a hearing listed in respect of the [REDACTED] on 30 November 2023, where the [REDACTED] will consider the *Norwich Pharmacal* application and will likely decide whether or not to grant the relief sought by [REDACTED] as well as any ancillary courses of action, such as an adjournment. Petitioner's 1782 Application is vitally important to its case in opposition to the relief sought by [REDACTED]. As the threshold test for the grant of relief pursuant to a *Norwich Pharmacal* application includes the existence of 'wrongdoing', the 1782 Application is directly relevant to [REDACTED] allegation that the Records are forgeries, and therefore [REDACTED] ability to meet that threshold test. [REDACTED] is highly likely to take into account whether or not subpoenas have been issued pursuant to the 1782 Application by the date of the hearing, given the probative nature of any evidence that is likely to be returned in respect of those subpoenas. It is also important for Petitioner to be able to explain to the [REDACTED] the stage at which the 1782 Application has progressed to, so as to provide fulsome information that can influence the appropriate orders to be made in the [REDACTED] [REDACTED]

5. There is also a hearing listed in respect of [REDACTED] on 27 November 2023. It is my understanding from evidence filed by the Claimant in the [REDACTED] [REDACTED] that this hearing will concern the authenticity of the Records.

6. Given these procedural developments, it is my view that it would best serve the interests of justice and the efficient resolution of the [REDACTED] and [REDACTED] [REDACTED] for the 1782 Application to be expedited.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 under the laws of the United States that the foregoing is true and correct.

Executed on November 16, 2023
in London

A handwritten signature in dark ink, appearing to read 'Edward Greeno', written in a cursive style.

Edward Greeno